

CALFRESH REQUEST FOR POLICY INTERPRETATION**PI# 18-03**

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Retain a copy for your records and submit via email to CalFresh-PI@dss.ca.gov.

Please note: the policy interpretation provided is based on the unique set of facts presented and should not be assumed to apply in all scenarios.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Other:		5. DATE OF REQUEST: 01/02/2018	NEED RESPONSE BY: 01/09/2018
2. REQUESTOR NAME:		6. COUNTY/ORGANIZATION: Santa Barbara County	
3. PHONE NO.: EMAIL:		7. SUBJECT: Failure to provide SSN on Newborn	
4. REGULATION CITE(S): 7 CFR 273.6(b)(4), MPP 63-404.4, 63-801.221		8. REFERENCES: <i>(Include ACL/ACIN, court cases, etc. in references)</i> NOTE: All requests must have a regulation cite(s) and/or a reference(s).	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

Per a PI regarding SSN Proof of Application with response dated 6/20/17, counties were informed that proof of application of SSN or SSN is needed for a newborn at the next recertification or within 6 months following the month the baby was born, whichever is later. Based on this response, we have the following questions:

- 1) If the SSN or proof of SSN has not been provided within 6 months following the birth of the child, should the county discontinue the child mid-period?
- 2) If the worker failed to take timely action at the recertification or within 6 months following the birth of the child to remove the child from the household, should the county calculate claims?

10. REQUESTOR'S PROPOSED ANSWER:

1) Per MPP 63-404.4, if the CWD determines that a hh member has failed without good cause to provide or apply for an SSN that individual shall be ineligible to participate until he/she complies. This disqualification will apply only to the individual for which the SSN is not provided and not the entire hh. For this reason, yes, the child should be discontinued mid-period as soon as 10-day notice can be provided.

2) Per MPP 63-801.221 A claim shall be handled as an administrative error claim if the overissuance was caused by the action or inaction of any CWD. For this reason, claims must be calculated if the county failed to take timely action to remove the child from the household.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

Based on the information provided above, CDSS concurs with the county's proposed answers. In the first scenario, the child can be discontinued mid-period if the discontinuance is within the 6 months time frame (as opposed to at recertification).

FOR CDSS USE

DATE RECEIVED:

January 2, 2018

DATE RESPONDED TO COUNTY/ALJ:

January 3, 2018 RA